



Re: Additional Proposed AIR Addendum Data Gaps Sampling



04/19/2011 07:57 PM

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Ryan, Bob,

EPA directs VPH analysis at the 8 additional stations and archive for potential future EPH analysis.

Thank you.

S

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Region 10 Dive Team: www.epa.gov/region10/dive

Portland Harbor Cleanup: www.epa.gov/region10/portlandharbor

Green Cleanups: <http://yosemite.epa.gov/R10/extaff.nsf/programs/greencleanups>

Green Cleanups (EPA only):

<http://204.47.216.153:9876/r10/infopage/cleanup.nsf/webpage/greener+cleanups>

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Visitors: Check-in @ PERC / Service Center on 12th floor:

<http://yosemite.epa.gov/r10/extaff.nsf/Homepage/Visiting+Seattle>

Ryan Barth

Sean -

04/19/2011 10:52:11 AM

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Date: 04/19/2011 10:52 AM

Subject: Additional Proposed AIR Addendum Data Gaps Sampling

Sean -

Thanks for the expedited conditional approval for the additional proposed sampling at the 8 stations.

With regards to VPH, we reviewed the VPH data obtained from the 13 surface sediment samples directed by EPA and all analyses were completed with the standard 14-day VPH hold times. Therefore, no additional VPH analysis is necessary for these stations and NW Natural will continue to archive the EPH sample containers previously obtained at these locations for 1 year. Our review of the VPH data at these stations also showed that there were no detections of the VPH carbon groups at any of the stations, which encompassed a large spatial area within the Initial Project Area and a wide range of detected chemical concentrations for other analytes (for example, PAHs). Due to this lack of detected VPH concentrations along with our detailed October 14, 2010 responses to EPA's direction to conduct EPH/VPH sampling, NW Natural reiterates that the collection of these data is inconsistent with the Portland Harbor Site process and that there are no current identified uses of these data to support the remedy design and selection process.

If EPA continues to direct VPH analysis at the 8 additional stations and archive for potential future EPH analysis within 1 year, NW Natural will agree to complete this sampling and analysis in order to minimize delays in the ongoing data gaps sampling and long-term project schedule. Consistent with the previously archived EPH samples, NW Natural understands that samples of sediments archived for potential EPH analysis will only be analyzed if it is determined at some later date that the data would be used consistent with the Portland Harbor Site process, including risk screening. It is our further understanding that if a Portland Harbor Site use for EPH and VPH fractionation data is developed, that any Gasco data will only be used in a manner that is consistent with that Portland Harbor Site process.

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-----Original Message-----

From: Sheldrake.Sean@epamail.epa.gov [mailto:Sheldrake.Sean@epamail.epa.gov]
Sent: Monday, April 18, 2011 6:30 PM
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Subject: Re: Additional Proposed AIR Addendum Data Gaps Sampling

Ryan, Bob,

EPA approves this request with changes. EPA requests the eight additional surface sediment locations in the April 15, 2011 proposal be analyzed for volatile petroleum hydrocarbons (VPH) and containers from these location be placed in archive (1 year holding time) for possible extractable petroleum hydrocarbons (EPH) analysis. In addition, subsequent to EPA's approval of the October 14, 2010 NW Natural proposal to collect additional samples in EPH/VPH containers from 13 of the 20 surface sediment grab samples, NW Natural indicated in a November 29, 2010 electronic mail from Bob Wyatt to myself that the VPH sample analysis may not have been completed within the standard 14-day hold time. If this is the case, then EPA also requests NW Natural analyze these 13 stations for VPH with the EPH containers placed in archive. To reiterate, these stations include DGS01, DGS04, DGS06, DGS08, DGS12, DGS13, DGS20, DGS21, DGS25, DGS26, DGS30, DGS31, and DGS34.

Thank you.

S

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Date: 04/15/2011 06:19 PM
Subject: Additional Proposed AIR Addendum Data Gaps Sampling

Per Bob's voicemail earlier today, during our preparation for the EPA-approved midge retesting at the Gasco Sediments Site next week, we identified that it would be helpful to collect some additional sediment samples around the periphery of the 20 stations identified in our scope of work addendum. This additional sample collection could be conducted concurrent with the approved retesting fieldwork and would minimize any potential schedule delays associated with possibly having to collect this additional data in the future.

Specifically, NW Natural proposes collecting surface sediment samples at eight additional locations denoted in the attached Figure 1 (stations DGS-46 through DGS-53). The surface sediments from stations DGS-46, DGS-47, and DGS-50 through DGS-53 would be archived. Chemical analyses and/or biological toxicity testing may be triggered at these stations if the adjacent proposed retest stations (DGS-01 and DGS-02, and DGS-30 through DGS-35, respectively) show midge bioassay toxicity using the EPA-recommended Reference Envelope Approach for the Portland Harbor RI/FS. Anchor QEA would notify EPA if these archived samples were triggered for analysis. Samples from stations DGS-48 and DGS-49 would undergo chemical analysis immediately after collection. These stations are co-located with historical sample stations WLCT0198GRAB05 and WLR0797WRBC22, respectively. Data quality concerns have been noted for both of these historical locations leading to their disqualification from use in the Portland Harbor risk assessment process. However, chemical concentrations identified at these stations are currently

being used as part of the Portland Harbor FS process and could therefore affect remedial evaluation in the vicinity of the Gasco Sediment Site Area of Interest. The surface sediments from stations DGS-48 and DGS-49 would therefore be analyzed for the chemical analyses identified in the Final Data Gaps QAPP - Project Area Identification Report (Anchor QEA 2010) to provide updated acceptable sediment quality data at these locations.

Any chemical analyses and/or biological testing at these additional proposed stations would be conducted in accordance with sampling and analysis procedures identified in the Final Data Gaps QAPP - Project Area Identification Report (Anchor QEA 2010). Please let us know if we have approval to complete this additional sampling prior to next Wednesday so we have sufficient time to conduct this additional sampling concurrent with the approved scope of work addendum sampling.

Regards.

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(See attached file: Gasco Prop_Retest_Additional_Samples_041511.pdf)